

DOCKET NO.: FST CF 15-5014808-S)	SUPERIOR COURT
)	
WILLIAM A. LOMAS,)	JUDICIAL DISTRICT OF
)	STAMFORD/NORWALK
Plaintiffs,)	
)	AT STAMFORD
versus)	
)	
PARTNER WEALTH MANAGEMENT, LLC)	
KEVIN G. BURNS, JAMES PRATT-HEANEY,)	SEPTEMBER 27, 2016
AND WILLIAM P. LOFTUS,)	
)	
Defendants.)	
)	
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)	
)	
PARTNER WEALTH MANAGEMENT, LLC,)	
KEVIN G. BURNS, JAMES PRATT-HEANEY,)	
AND WILLIAM P. LOFTUS,)	
)	
Counterclaim Plaintiffs,)	
)	
versus)	
)	
WILLIAM A. LOMAS,)	
)	
Counterclaim Defendant.)	

DISCLOSURE OF EXPERT WITNESSES

Pursuant to Section 13-4 of the Practice Book, the Defendants and Counterclaim Plaintiffs, Partner Wealth Management, LLC (“PWM”), Kevin G. Burns (“Burns”), William P. Loftus (“Loftus”), and James Pratt-Heaney (“Pratt-Heaney”) hereby disclose that they intend to call JAMIE H. MCLAUGHLIN, to testify in the trial of this matter as an expert witness in support of Defendants’ and Counterclaim Plaintiffs’ counterclaims as set forth in their Counterclaim Complaint dated September 23, 2016:

I. NAME, ADDRESS, AND EMPLOYER OF EXPERT

Jamie H. McLaughlin
J.H. McLaughlin & Co., LLC
21 Leeuwarden Road
Darien, CT 06820

II. FIELD OF EXPERTISE

Strategy and practice management for wealth management and investment advisory firms, private banks, single and multi-family offices; the wealth management and investment advisory industry and business, its customs, standards, norms, expectations, and practices. (*See also* <http://www.jhmclaughlin.com/>).

III. SUBJECT MATTER ON WHICH EXPERT IS EXPECTED TO TESTIFY

Mr. McLaughlin is expected to testify regarding the prevailing norms, expectations, standards, customs, and practices of the wealth management industry and investment advisory firms. He is expected to testify regarding the expected conduct and performance of individual wealth managers and investment advisors who are principals of wealth management firms and/or investment advisory firms; the compensation levels for such persons; and the standards, norms, customs, practices, and expectations for a principal of a wealth management and/or investment advisory firm upon a principal's withdrawal from that firm.

IV. EXPERT OPINION

Mr. McLaughlin is expected to opine that:

- (1) Mr. Lomas' performance and business development failed to meet the prevailing norms, expectations, standards, and customs of the wealth management and/or investment advisory industry;
- (2) Mr. Lomas was compensated at a level that was disproportionately high relative to his performance; and

- (3) Mr. Lomas failed to adhere to and/or meet the norms, expectations, standards, customs, and practices of the wealth management and/or investment advisory industry upon noticing his withdrawal on or about October 13, 2014 and thereafter.

V. SUBSTANCE OF GROUNDS FOR EXPERT OPINION

The substance of the grounds for each expert opinion is as follows:

- (1) This information will be contained in a written report of Mr. McLaughlin, which will be prepared and produced as soon as possible;
- (2) Mr. McLaughlin's years of education, training, study, and professional experience in the aforementioned fields; and
- (3) Mr. McLaughlin's review of the relevant records, documents, and testimony produced to date in this matter.

VI. RESERVATION OF RIGHTS

The Defendants and Counterclaim Plaintiffs respectfully reserve their rights to elicit further, additional, and/or different expert opinions from Mr. McLaughlin as may become necessary as the case continues to develop and unfold and proceeds to and through trial.

Dated: September 27, 2016
New York, New York

GERARD FOX LAW P.C.

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*Attorneys for Defendants and Counterclaim
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was caused to be emailed and mailed on September 27, 2016 to:

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/s/Edward D. Altabet
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